

January 31, 2022

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VIA ECF

The Honorable Ann M. Donnelly
225 Cadman Plaza East
Courtroom 4GN
Brooklyn, New York 11201

Reference Number
040714.00002

Re: United States v. Simonlacaj, et. al, 19 cr. 00575 (AMD)

Dear Judge Donnelly,

We represent John Simonlacaj in the above-referenced case. As the Court is aware, Mr. Simonlacaj was sentenced to serve four months' incarceration. He has completed his term of imprisonment, has satisfied the financial aspects of the Judgment of Conviction and is now on supervised release. We write to request that the Court grant Mr. Simonlacaj permission to travel to Montenegro and Albania from May 4 to June 30, 2022 in order to address myriad issues related to his father's estate. His father passed shortly before Mr. Simonlacaj began serving his term of imprisonment.

We have communicated with Mr. Simonlacaj's Probation Officer who has no objection to this request but stated that it required Your Honor's approval. Similarly, AUSA Bensing informed us that the Government has no objection to this request.

Respectfully submitted,

s/ Glenn Colton

Glenn Colton

cc: Kayla Bensing, AUSA